M/047/032
Please File

From: Paul Baker
To: Crockett, Matthew
Date: 11/21/05 11:33:49 AM
Subject: Re: Analyses for Crown Asphalt Ridge

What we need is a letter from the permittee with the information in your e mail and with a brief description of what's going on--basically the type of equipment being used and the duration. From the location description you gave me, it sounds like the permittee of the land where Cassandra is operating is Uintah county. Assuming the equipment is portable and there's not too much, I don't see a problem with us approving it.

I'm attaching a map that shows the two permit areas. Uintah county has everything in Section 30 except the processing plant, and Wembco is the permittee for the plant and everything in Section 31.

>>> "Matthew L. Crockett" <mlc@pruittgushee.com> 11/21/2005 11:02 AM >>>
Paul:

Thanks for the fax on Crown's prior analyses. The analysis we've specified for the experimenter should be more protective than what Crown did. Wembco's requirement is that the experimenter analyze waste sand for the following:

TCLP metals;

Volatile Organic Compounds ("VOCs"), which includes the BTEX;

Total Recoverable Petroleum Hydrocarbons ("TRPH"); and

pH.

The experimenter is to hire a UDEQ-certified soil sampler to collect the samples (they've hired Mike Mold in Vernal), and have them analyzed at a UDEQ-certified laboratory (they're using American West Analytical Laboratory). Once the test run has been completed, Wembco requires the experimenter to have 2 composite samples collected from the waste sand stockpile for the above analyses. In the interim, the waste sand is stored on, and covered by, a minimum of 6-mil polyethelene sheeting (visqueen) to prevent any leaching or infiltration of precipitation. The stockpile is to be located within an earthern berm to deflect surface runoff from reaching the stockpile. Storage on/under visqueen is the standard UDEQ/DERR procedure for stockpiling of soils impacted by petroleum hydrocarbons.

Any separation processes are conducted within an earthern berm lined with a 20-mil, HDPE lined polyethelene liner. According to the specifications the experimenter sent me, the liner is made by GeoChem, Inc., and has been accepted by the State of Alaska Department of Environmental Conservation for use in oil field applications and meets ASTM D471-96 for oil resistance. The experimenter is required to capture any spills or stormwater within the

liner, immediately repair any punctures, and collect pre- and post-processing samples from beneath the liner location.

I checked with the experimenter on Friday and with Crown's operations guy this morning. The experimenter has only put a couple of shovels of tar sands into its equipment to date. It hopes to have the bugs out of the system and run test batches in the near future.

I'll call you to discuss the above.

Matthew L. Crockett

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